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U.S. Department  
of Transportation

**National Highway  
Traffic Safety  
Administration**

DEPT. OF TRANSPORTATION  
DOCKETS

02 JUL 26 PM 3:30

# Memorandum

NHTSA-02-11846-7

Subject: Request to Place Comment in the Docket  
Regarding Decision for 2001 and 2002  
Mercedes-Benz SL passenger cars

Date: JUN 27 2002

From: Coleman Sachs *CS*  
Attorney

Reply to  
Attn. of:

To: Docket Management

Please place the attached document regarding whether  
nonconforming 2001 and 2002 Mercedes-Benz SL passenger cars are  
eligible for importation, as requested in Petition No. 499, in  
Docket No. NHTSA-2002-11846.

Attachment

#





Registered Importer R-00-214  
1092 Jupiter Park Lane  
Suite 140  
Jupiter, FL 33458

**May 30, 2002**

George Entwistle  
Department of Transportation  
NHTSA  
400 7<sup>th</sup> St., SW  
Washington, DC 20590

Dear Mr. Entwistle,

As a follow up to my previous letter regarding docket number 2002-11846 I am listing below the items I feel were overlooked in the petition filed by J.K. Technologies.

**FMVSS 581** Upon physical inspection we have determined that the front and rear bumper reinforcements *do not* extend to the corners of the chassis on either the drivers or passengers side. Furthermore, it has been our experience that some manner of reinforcement is required past the bumper corner and must continue longitudinally for a minimum of three inches.

It is our belief that without the aforementioned reinforcements that the Mercedes Benz SL (230 Body) is incapable of meeting the requirements set forth in 49 CFR 581.7(b).

Pictures of the vehicle we inspected are included in this correspondence.

**FMVSS 108** Upon physical inspection we have determined that the rear tailamp assemblies are capable of being modified to meet FMVSS 108. The required reflective materials for red side marker lamps are incorporated in all tailamp assemblies manufactured for these cars. One additional light source can be added to the appropriate spot in each tailamp assembly bring said assembly into compliance. Replacement of the assemblies is compliant but not necessary.

**FMVSS 301** J.K. Technologies made the statement that "The fuel system in this vehicle is identical to that of the US model", we disagree. After careful inspection we have determined that the fuel tank and related evaporative emission devices are not OBD2 compliant. Both systems must be able to trigger a "check engine" light in the event that a leak develops in either system and do not have the capacity to do so. It is our belief that the fuel tank and evaporative emissions canister must be replaced with parts designed for US Model cars.

Although the last item does not relate directly to Department of Transportation standards we feel that an incorrect statement was made and deserved to be rectified.

I can be reached at the numbers below to answer any questions you might have.

Sincerely,

David Castelhana  
President

**561-747-3311 telephone 561-747-3378 fax**